

EXHIBIT 18

**REDACTED VERSION OF
DOCUMENT SOUGHT TO BE
SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939-WHA
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
Defendants.)
_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

CONTINUED VIDEOTAPED DEPOSITION OF GAETAN PENNECOT

San Francisco, California

Wednesday, June 14, 2017

Volume II

Reported by:

SUZANNE F. GUDELJ, CSR No. 5111

Job No. 2638084

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Continued Videotaped Deposition of GAETAN PENNECOT,
Volume II, taken on behalf of Plaintiff Waymo
LLC, at the Law Offices of Quinn Emanuel
Urquhart & Sullivan LLP, 50 California Street,
22nd Floor, San Francisco, California,
beginning at 9:13 a.m., and ending at 4:38 p.m.
a.m., on Wednesday, June 14, 2017, before
SUZANNE F. GUDELJ, Certified Shorthand Reporter
No. 5111.

1 Q What does that refer to?

2 A That would be where the light is exiting
3 from the laser die, so that would be the front
4 surface of the die.

5 Q Okay. Have you -- and then there's 02:54:03
6 something that says [REDACTED]?

7 A Yes.

8 Q What does that refer to?

9 A [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

13 Q Why did you include the [REDACTED]

[REDACTED] in this

15 document, Exhibit 155? 02:54:38

16 A Because the [REDACTED]

[REDACTED]

[REDACTED].

19 Q So the [REDACTED]

[REDACTED]; is that right? 02:55:02

21 A So that was the goal.

22 Q Okay. And that's how you wrote this
23 document?

24 A That's how I wrote that document. However,

25 like you've seen like "fiducial" next to [REDACTED] 02:55:14

1 [REDACTED] people at the die bonding machine --

2 (Reporter clarification.)

3 Die bonding, so d-i-e bonding machine, the
4 pattern recognition didn't work really well with the

5 [REDACTED]. 02:55:39

6 So they wanted to use like a fiducial, so
7 fiducial being some mark on the PCB on the copper,
8 and they would take like their optic -- pattern
9 recognition reference on the copper instead of doing
10 it on the [REDACTED]. 02:56:06

11 Q Okay. The transmit board here -- depicted
12 here, Fuji has [REDACTED], right?

13 A This is correct.

14 Q And there are [REDACTED]
15 [REDACTED], right? 02:56:24

16 A This is correct.

17 Q Are you aware of any other LiDARs that have
18 [REDACTED]?

19 A Yes.

20 Q What are you aware of? 02:56:37

21 A GBR3.

22 Q Okay. Apart from GBR3, are there any
23 others that you're aware of?

24 A I'm not aware of any others.

25 Q Okay. And then in terms of this circuit 02:56:49

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1 board [REDACTED] --

2 A Mm-hmm.

3 Q -- [REDACTED], are you
4 aware of any other LiDARs that include a similar

5 [REDACTED]? 02:57:05

6 A So what -- what do you mean by "similar"?

7 Q Just referring to the kind of [REDACTED]

[REDACTED]

[REDACTED].

10 A So this [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

12 (Reporter clarification.)

13 [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 Q On a [REDACTED]? 02:58:18

21 A [REDACTED], no.

22 Q So my question is: Are you familiar with a
23 similar [REDACTED]

[REDACTED]?

25 A No. 02:58:36

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

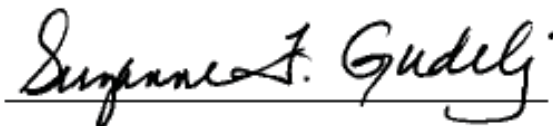
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [x] was not requested.

16 I further, certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: 6/19/2017

22
23 

24 SUZANNE F. GUDELJ

25 CSR No. 5111